

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

In the Matter of	)	
	)	
Streamlining Deployment of Small Cell	)	
Infrastructure by Improving Wireless Facilities	)	WT Docket No. 16-421
Siting Policies;	)	
	)	
Mobilitie, LLC Petition for Declaratory Ruling	)	

**REPLY COMMENTS OF JAMES C HULCE ON THE MOBILITIE, LLC, PETITION FOR DECLARATORY RULING**

I, James C Hulce, hereby submit my reply comments in response to the Mobilitie, LLC Petition for Declaratory Ruling (“Mobilitie Petition”) and the Federal Communications Commission’s (“Commission’s”) corresponding Public Notice.

I focus my reply on a subset of the issues raised by parties’ initial comments. Specifically, I urge that the Commission reject the argument posed by numerous individual commentators that allege health problems are caused by the radiofrequency emissions of wireless communications networks. In addition, I urge that the Commission reject the assertion posed the National League of Cities and others<sup>1</sup> that “it is impossible that a one-size-fits-all regulatory scheme can adequately take into account the various needs and interests of all communities across the nation.”

**Alleged Health Concerns**

Numerous individuals have submitted comments to this proceeding regarding alleged health problems caused by exposure to radiofrequency and/or electromagnetic emissions by small cells, DAS, cellular networks, and other wireless communications. These dubious claims are based on hysteria, not hard facts, and I urge the Commission to totally reject them. The comments usually do not cite specific sources for their claims. When sources are cited, they are often taken out of context, are mischaracterized, or are from discredited studies. The Commission has historically established that wireless communications are safe, and comments about the safety of wireless communications are not relevant to this proceeding.

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<sup>1</sup> See joint comments of National League of Cities, National Association of Telecommunications Officers and Advisors, National Association of Towns and Townships, National Association of Counties, National Association of Regional Councils, Government Finance Officers Association, proceeding WTB 16-421, filed March 8, 2017

**Needs and interests of communities across the nation**

The National League of Cities asserts and others echo that “it is impossible that a one-size-fits-all regulatory scheme can adequately take into account the various needs and interests of all communities across the nation.” The United States contains many thousands of individual communities, and there are not thousands of needs so extremely unique that they cannot fit into the same regulatory framework. I urge the Commission to reject the argument and institute one streamlined regulatory system for small cells.